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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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EDMC

March 7, 2008

Ms. Shirley J. Olinger, Manager  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Mr. William S. Elkins, Project Director  
Bechtel National, Inc.  
2435 Stevens Center Place, MSIN: H4-02  
Richland, Washington 99354

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form  
24590-HLW-PCN-ENV-06-026; Class <sup>1</sup> Modification to the Hanford Facility Resource  
Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, for the  
Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10  
(Waste Treatment and Immobilization Plant), WA7890008967

Reference: Letter dated March 7, 2008, from E. Fredenburg, ECY, to S. J. Olinger,  
USDOE-ORP, and W. S. Elkins, BNI, "Steam Cleanout of Plugged Piping" 6076417

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the subject Class <sup>1</sup> Modification submitted  
January 22, 2008. The approved Hanford Facility RCRA Permit Modification Notification Form  
is enclosed.

Modification 24590-HLW-PCN-ENV-06-026 provides the Piping and Instrument Diagrams  
(P&ID) for the High-Level Waste (HLW) Facility Melter Cave Support Handling System (HSH)  
Decontamination Tanks. The P&IDs listed below will be added to appendix 10.2 of the permit.

- 24590-HLW-M6-HSH-P0004, Revision 0 (HSH-TK-00001)
- 24590-HLW-M6-HSH-P20004, Revision 0 (HSH-TK-00002)

The tanks are currently in the permit on the HLW Radioactive Liquid Waste Disposal (RLD)  
System P&IDs (24590-HLW-M6-RLD-P0003 and 24590-HLW-M6-RLD-P20003).  
The removal of the tanks from the RLD P&IDs will be submitted under permit modification  
notification form 24590-HLW-PCN-ENV-06-015.

During our review, Ecology raised questions regarding the design and use of the steam cleanout  
process to clear a plugged drain line. Ecology prepared the referenced letter requesting  
additional information on all steam cleanout processes in the Waste Treatment Plant.



Ms. Olinger and Mr. Elkins  
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Ecology is approving the subject permit modification because the HSH steam cleanout lines are currently in the permit and do not affect the overall design of the tank.

During the transition period from permit drawings to engineering source drawings, the parties agree you may show in phantom, items not requiring an installation inspection or inclusion in the Independent Qualified Registered Professional Engineer report. Ecology is approving the design changes identified in the Permittees' submittal. Decisions on the regulation of items shown in phantom will be made later. At the end of the transition period, permit submittals will contain engineering source documents and will be incorporated into the permit as described in Ecology Publication # 07-05-006 ([www.ecy.wa.gov/biblio/nwp.html](http://www.ecy.wa.gov/biblio/nwp.html)).

If there are any questions, contact me at 509-372-7882 or David Becker at 509-372-7990.

Sincerely,



Brenda Becker-Khaleel  
WTP Permit Writer  
Nuclear Waste Program

trw/aa  
Enclosure

cc electronic w/enc:

Dave Bartus, EPA  
John Eschenberg, USDOE  
Lori Huffman, USDOE  
Tony McKarns, USDOE  
Gae Neath, USDOE  
Don Sommer, USDOE  
William Taylor, USDOE  
Julie Colby, BNI

Brad Erlandson, BNI  
Peggy Fisher, BNI  
Stan Hill, BNI  
Dennis Klein, BNI  
Sandi Murdock, BNI  
Suzette Thompson, FHI  
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements ✓  
Environmental Portal  
Hanford Operating Record General File  
USDOE-ORP Correspondence Control

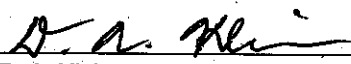
Quarter Ending 12/31/2007

24590-HLW-PCN-ENV-06-026

**Hanford Facility RCRA Permit Modification Notification Form****Part III, Operating Unit 10****Waste Treatment and Immobilization Plant****Index**

Page 2 of 4: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant  
Update HLW Vitrification Building Piping and Instrumentation Diagrams (P&IDs) for the HLW  
Decontamination Tanks (HSH-TK-00001 and HSH-TK-00002) in Appendix 10.2 of the Dangerous Waste  
Permit.

Submitted by Co-Operator:

  
D. A. Klein12/18/07  
Date

Reviewed by ORP Program Office:

  
S. J. Olinger1/22/08  
Date

Quarter Ending 12/31/2007

24590-HLW-PCN-ENV-06-026

## Hanford Facility RCRA Permit Modification Notification Form

Unit:

Waste Treatment and Immobilization Plant

Permit Part &amp; Chapter:

Part III, Operating Unit 10

Description of Modification:

The purpose of this Class 1 prime modification is to update the Piping and Instrumentation Diagrams (P&IDs) for the HLW Decontamination Tanks (HSH-TK-00001 and HSH-TK-00002). These tanks were previously shown on the HLW Radioactive Liquid Waste Disposal (RLD) System P&IDs 24590-HLW-M6-RLD-P0003 and 24590-HLW-M6-RLD-P20003 incorporated in Appendix 10.2 of the permit. The following permit P&IDs are submitted for inclusion in Appendix 10.2:

## Appendix 10.2

Add:	24590-HLW-M6-HSH-P0004 Rev 0
	24590-HLW-M6-HSH-P20004 Rev 0

The HLW Decontamination Tank design details have been relocated from the RLD system permit P&ID to the HSH system P&IDs. The updated RLD P&IDs showing the removal of Decontamination Tanks will be submitted with a separate permit modification notice (24590-HLW-PCN-ENV-06-015).

This modification incorporates changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.) and changes associated with the vendor design submittals since the issuance of the last revision of the permitted RLD drawings. This modification requests Ecology approval and incorporation into the permit of the HSH system P&IDs showing the design consistent with the permit Process Flow Diagram (24590-HLW-M0-HSH-P0075). The following identifies the significant types of design changes on the attached drawings:

- Added drain line to the Decontamination Tank from the parts washer
- Deleted jumper valves from the tank drain line

The following is a list of outstanding change documents that have not been incorporated into this modification:

None

WAC 173-303-830 Modification Class: <sup>1 2</sup>

Class 1

Class <sup>1</sup>1

Class 2

Class 3

Please mark the Modification Class:

X

Enter Relevant WAC 173-303-830, Appendix I Modification citation number:

N/A

Enter wording of WAC 173-303-830, Appendix I Modification citation:

In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class <sup>1</sup>1 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."

Modification Approved: ☒ Yes ☐ No (state reason for denial)

Reason for denial:

Reviewed by Ecology:



B. Becker-Khaleel

3/7/08

Date

<sup>1</sup> Class 1 modifications requiring prior Agency approval.

<sup>2</sup> If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class 1, if applicable.